



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

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COMMISSIONER

**Limington Lumber Company
Cumberland County
East Baldwin, Maine
A-714-71-G-M (SM)**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #1**

FINDINGS OF FACT

After review of the air emissions license amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (the Department) finds the following facts:

I. REGISTRATION

A. Introduction

Limington Lumber Company (Limington Lumber) was issued Air Emission License A-714-71-F-R on January 11, 2013, permitting the operation of emission sources associated with their sawmill and planer mill. Limington Lumber has requested a minor revision to their license in order to include an additional double kiln for drying lumber.

The equipment addressed in this license amendment is located at 411 Pequawket Trail, Route 113, in East Baldwin, Maine.

B. Emission Equipment

The following equipment is addressed in this minor revision to the air emission license:

<u>Equipment</u>	<u>Max. Production Rate</u>	<u>Control Equipment</u>	<u>Date of Manuf./ Install.</u>
Double Drying Kiln	3 MMBF	none	2014

C. Application Classification

This amendment will not increase emissions of any pollutant. Therefore, this amendment is determined to be a minor revision and has been processed as such.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Kilns

Limington Lumber operates a pre-dryer and several kilns for drying lumber. With the addition of the new double kiln, there are a total of 12 wood drying kilns on site, eight of which are single kilns and two double kilns. The kilns are operated at about 150 °F over several days, resulting in a moisture content of 10 to 12% in the finished product. The new double kiln shall exhaust through Stack #24, which has an above ground stack height of 20 feet.

The total pre-dryer and kilns throughput is limited in air emission license A-714-71-F-R (January 11, 2013) to 18.1 million board feet per year based on a 12-month rolling total, and VOC emissions from drying the maximum throughput are 20.5 tons/year. The addition of the double kiln is not to increase production but to allow greater flexibility in the processing of material for the facility; thus, these limits are not being increased with the addition of the new double kiln. In addition, there will be no increase in fuel fired in the boilers to support operation of the additional double kiln, and the type of lumber being dried will not change.

There are no New Source Performance Standards (NSPS) or National Emissions Standards for Hazardous Air Pollutants (NESHAP) requirements applicable to the wood drying equipment at Limington Lumber.

C. Annual Emissions

Total annual emissions will not change as a result of this minor revision. Licensed emission limits and throughput limits are not affected by the addition of the new double kiln; thus, total annual emissions will not change as a result of this minor revision.

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source is determined by the Department on a case-by case basis. In accordance with 06-096 CMR 115, an ambient air quality impact analysis is not required for a minor source if the total licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	Tons/Year
PM ₁₀	25
SO ₂	50
NO _x	50
CO	250

The total licensed annual emissions for the facility are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this minor revision.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-714-71-G-M subject to the conditions found in Air Emission License A-714-71-F-R and the following conditions.

Severability. The invalidity or unenforceability of any provision of this License or part thereof shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

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SPECIFIC CONDITIONS

The following language shall be added to Specific Condition (19) in Air Emission License A-714-71-F-R, directly following the heading of Specific Condition (19), as follows:

(19) Wood Drying Kilns

Limington Lumber is licensed to operate a pre-dryer and a total of 12 wood drying kilns, eight of which are single kilns and two double kilns. Throughput and VOC emissions from wood drying shall comply with the following limitations and calculation methods.

DONE AND DATED IN AUGUSTA, MAINE THIS 10 DAY OF April, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Come for
PATRICIA W. AHO, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-714-71-F-R.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: March 23, 2015

Date of application acceptance: March 23, 2015

Date filed with the Board of Environmental Protection:

This Order prepared by Jane E. Gilbert, Bureau of Air Quality.

